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16 Attorneys for Objecting Secured Creditor  
17 The Bank of New York Mellon fka The  
18 Bank of New York as Trustee for the  
19 Benefit of the Certificateholders of the  
20 CWABS, Inc., Asset-Backed  
21 Certificates, Series 2004-ECC2

14 UNITED STATES BANKRUPTCY COURT  
15  
16 NORTHERN DISTRICT OF CALIFORNIA

17 In re ) Bk. No. 13-45365-RLE-13  
18 )  
19 ERIC TODD STANDRIDGE, ) Chapter 13  
20 )  
21 Debtor. ) OBJECTIONS TO PROPOSED  
22 ) AMENDED CHAPTER 13 PLAN  
23 ) AND CONFIRMATION THEREOF  
24 )  
25 ) Hearing -  
26 ) Date : December 10, 2013  
27 ) Time : 1:30 p.m.  
28 ) Place : U.S. Bankruptcy Court  
1300 Clay Street, 2nd Floor  
Oakland, CA  
Courtroom 201

27 The Bank of New York Mellon fka The Bank of New York as Trustee for the Benefit of  
28 the Certificateholders of the CWABS, Inc., Asset-Backed Certificates, Series 2004-ECC2,

1 secured creditor in the above-entitled Bankruptcy proceeding, its assignees and/or successors in  
2 interest, holds the senior lien on the subject property generally described as **787 Crescent Drive,**  
3 **Brentwood, California 94513,** and hereby submits the following objections to the confirmation  
4 of that certain Amended Chapter 13 Plan (the "Plan") proposed by Debtor:

5 LACK OF ADEQUATE FUNDING

6 The Plan is not adequately funded. 11 U.S.C. §1325(a)(5)(B)(ii) requires full payment of  
7 the allowed claim of this objecting Secured Creditor. The arrearage amount provided for in  
8 Debtor's Chapter 13 Plan is insufficient to cure the pre-petition arrears owed to Secured  
9 Creditor. The actual arrearage amount will be disclosed in a timely filed Proof of Claim.  
10 Accordingly, even if all payments are tendered pursuant to the Plan, they will not be sufficient to  
11 satisfy Secured Creditor's claim in full.

12 CONCLUSION

13 Any Chapter 13 Plan proposed by Debtor must provide for and eliminate the  
14 objections specified above in order to be feasible and to provide adequate protection to this  
15 objecting secured creditor. It is respectfully requested that confirmation of the Amended  
16 Chapter 13 Plan as proposed by Debtor, be denied.

17 WHEREFORE, secured creditor prays as follows:

- 18 (1) That confirmation of the proposed Chapter 13 Plan be denied.  
19 (2) For attorneys' fees and costs incurred herein.  
20 (3) For dismissal of the Chapter 13 proceeding with a 180 day bar to refiling.  
21 (4) For such other relief as this Court deems proper.

22 Dated: November 1, 2013

Prober & Raphael, A Law Corporation

23 By /s/ Jeannette R. Marsala

24 JEANNETTE R. MARSALA, ESQUIRE #253125

25 Attorney for Secured Creditor

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1 **SPECIAL NOTICE**

2 **THE FOLLOWING NOTICE IS GIVEN TO YOU IN THE EVENT THAT**  
3 **THE FEDERAL FAIR DEBT COLLECTIONS ACT APPLIES TO THIS**  
4 **COMMUNICATION.**

5 The following statement provides you with notice of certain rights which you may have by law.  
6 Nothing in this statement modifies or changes the hearing date or response time specified in the  
7 attached documents or your need to take legal action to protect your rights in this matter. No  
8 provision of the following statement modifies or removes your need to comply with local rules  
9 concerning the attached documents.

10 **CONSUMER DISCLOSURE**

11 This communication is made in an attempt to collect on a debt or judgment and any information  
12 obtained will be used for that purpose. Please be advised that if you notify Prober and Raphael,  
13 ALC within 30 days that all or a part of your obligation or judgment is disputed, then Prober and  
14 Raphael, ALC will mail you a written verification of the obligations or judgment and the amounts  
15 owed to The Bank of New York Mellon fka The Bank of New York as Trustee for the Benefit of the  
16 Certificateholders of the CWABS, Inc., Asset-Backed Certificates, Series 2004-ECC2. In addition  
17 and upon your request within 30 days, you will be provided with the name and address of the  
18 original creditor, if different from the current creditor.